KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR

NEW YORK, NEW YORK 10118

TEL (212) 763-0883 | FAX (212) 564-0883

WWW.KAPLANHECKER.COM

DIRECT DIAL 212.763.0886

DIRECT EMAIL rtolentino@kaplanhecker.com

November 17, 2021

BY ECF

The Honorable Norman K. Moon United States District Court Western District of Virginia 255 West Main Street Charlottesville, VA 22902

Re: Sines et al. v. Kessler et al., No. 3:17-cv-0072 (NKM) (JCH)

Dear Judge Moon:

Attached for your consideration is Plaintiffs' revised proposed verdict form, along with a redline reflecting the proposed revisions to our original proposed verdict form.

Respectfully submitted,

Raymond Tolentino Counsel for Plaintiffs

cc: Counsel of Record

KAPLAN HECKER & FINK LLP

Of Counsel:

Roberta A. Kaplan (pro hac vice) Julie E. Fink (pro hac vice) Gabrielle E. Tenzer (pro hac vice) Michael L. Bloch (pro hac vice) Raymond P. Tolentino (pro hac vice) Yotam Barkai (pro hac vice) Emily C. Cole (pro hac vice) Alexandra K. Conlon (pro hac vice) Jonathan R. Kay (pro hac vice) Benjamin D. White (pro hac vice) KAPLAN HECKER & FINK LLP 350 Fifth Avenue, Suite 7110 New York, NY 10118 Telephone: (212) 763-0883 rkaplan@kaplanhecker.com ifink@kaplanhecker.com gtenzer@kaplanhecker.com mbloch@kaplanhecker.com rtolentino@kaplanhecker.com ybarkai@kaplanhecker.com ecole@kaplanhecker.com aconlon@kaplanhecker.com jkay@kaplanhecker.com bwhite@kaplanhecker.com

Robert T. Cahill (VSB 38562) COOLEY LLP 11951 Freedom Drive, 14th Floor Reston, VA 20190-5656 Telephone: (703) 456-8000 Fax: (703) 456-8100 rcahil@cooley.com

David E. Mills (*pro hac vice*) Joshua M. Siegel (VSB 73416) Caitlin B. Munley (*pro hac vice*)

Karen L. Dunn (pro hac vice) Jessica Phillips (pro hac vice) William A. Isaacson (pro hac vice) Arpine S. Lawyer (pro hac vice) Giovanni Sanchez (pro hac vice) Matteo Godi (pro hac vice) PAUL, WEISS, RIFKIND, WHARTON & **GARRISON LLP** 2001 K Street, NW Washington, DC 20006-1047 Telephone: (202) 223-7300 Fax: (202) 223-7420 kdunn@paulweiss.com jphillips@paulweiss.com wisaacson@paulweiss.com alawyer@paulweiss.com gsanchez@paulweiss.com mgodi@paulweiss.com

2

Makiko Hiromi (pro hac vice)
Nicholas A. Butto (pro hac vice)
Agbeko Petty (pro hac vice)
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
1285 Avenue of the Americas
New York, NY 10019-6064
Telephone: (212) 373-3000
Fax: (212) 757-3990
mhiromi@paulweiss.com
nbutto@paulweiss.com
apetty@paulweiss.com

Alan Levine (pro hac vice)
Philip Bowman (pro hac vice)
COOLEY LLP
55 Hudson Yards
New York, NY 10001
Telephone: (212) 479-6260
Fax: (212) 479-6275
alevine@cooley.com
pbowman@cooley.com

KAPLAN HECKER & FINK LLP

Samantha A Strauss (pro hac vice)
Alexandra Eber (pro hac vice)
Daniel Philip Roy, III (pro hac vice)
Allegra Flamm (pro hac vice)
Gemma Seidita (pro hac vice)
Khary Anderson (pro hac vice)
COOLEY LLP
1299 Pennsylvania Avenue, NW
Suite 700

Washington, DC 20004 Telephone: (202) 842-7800

Fax: (202) 842-7800
Fax: (202) 842-7899
dmills@cooley.com
jsiegel@cooley.com
cmunley@cooley.com
sastrauss@cooley.com
droy@cooley.com
droy@cooley.com
aflamm@cooley.com
gseidita@cooley.com
kjanderson@cooley.com

J. Benjamin Rottenborn (VSB 84796) WOODS ROGERS PLC 10 South Jefferson St., Suite 1400 Roanoke, VA 24011 Telephone: (540) 983-7600

Fax: (540) 983-7711

brottenborn@woodsrogers.com

Counsel for Plaintiffs

3

4

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2021, I served the following via electronic mail:

Elmer Woodard 5661 US Hwy 29 Blairs, VA 24527 isuecrooks@comcast.net

James E. Kolenich Kolenich Law Office 9435 Waterstone Blvd. #140 Cincinnati, OH 45249 jek318@gmail.com

Counsel for Defendants Jason Kessler, Nathan Damigo, and Identity Europa, Inc. (Identity Evropa)

Bryan Jones 106 W. South St., Suite 211 Charlottesville, VA 22902 bryan@bjoneslegal.com

Counsel for Defendants Michael Hill, Michael Tubbs, and League of the South

Joshua Smith Smith LLC 807 Crane Avenue Pittsburgh, PA 15216-2079 joshsmith2020@gmail.com

Counsel for Defendants Matthew Parrott, Traditionalist Worker Party and Matthew Heimbach David L. Campbell
Justin Saunders Gravatt
Duane, Hauck, Davis & Gravatt, P.C.
100 West Franklin Street, Suite 100
Richmond, VA 23220
dcampbell@dhdglaw.com
jgravatt@dhdglaw.com

Counsel for Defendant James A. Fields, Jr.

William Edward ReBrook, IV The ReBrook Law Office 6013 Clerkenwell Court Burke, VA 22015 edward@rebrooklaw.com

Counsel for Defendants Jeff Schoep, National Socialist Movement, Nationalist Front, Matthew Parrott, Traditionalist Worker Party and Matthew Heimbach

KAPLAN HECKER & FINK LLP

I hereby certify that on November 17, 2021, I also served the following by electronic mail:

Richard Spencer richardbspencer@icloud.com richardbspencer@gmail.com Robert "Azzmador" Ray azzmador@gmail.com

5

Vanguard America c/o Dillon Hopper dillon_hopper@protonmail.com Elliott Kline a/k/a Eli Mosley eli.f.mosley@gmail.com deplorabletruth@gmail.com eli.r.kline@gmail.com

I hereby certify that on November 17, 2021, I will serve the following by hand:

Christopher Cantwell Christopher Cantwell 00991-509 Central Virginia Regional Jail 13021 James Madison Hwy Orange, VA 22960

> Raymond Tolentino (pro hac vice) KAPLAN HECKER & FINK LLP

Counsel for Plaintiffs